

REMARKS

In the Office Action, claims 65, 69, and 71-74 were objected to because of certain informalities. Claims 59-64 were rejected under 35 U.S.C. § 102(b) as being anticipated by USP 4,782,193 issued to Linsker et al. ("Linsker"). Claims 65-71 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Teig et al. ("Teig," US Pat. Appln. 2002/0069397) in view of Linsker. In this Amendment, Applicants have amended claims 59, 62, 65, 69, and 71-74. (Claims 59 and 62 were only amended with respect to a formality.) Accordingly, claims 59-74 will be pending after entry of this Amendment.

I. Draftperson's Objection Under 37 CFR 1.84

Applicants note that the draftsperson objected to certain informalities with respect to Figures 1, 4b, 4c, 7, 22, and 23. As the Examiner has accepted the drawings, Applicants believe such informalities can be addressed within 3 months from the mailing of a Notice of Allowance in the instant case.

II. Claim Objections

Claims 65, 69, and 71-74 stand objected to due to certain informalities. Applicants have amended the subject claims in accordance with the Examiner's suggestions.

III. Claim Rejections

A. Rejection of the Claims Under 35 U.S.C. § 102

Claims 59-64 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Linsker. Applicants respectfully traverse the rejection with arguments presented below.

1. Linsker Does Not Disclose All Elements of Applicants' Invention

Claim 59, the only independent claim at issue for the anticipation rejection, contains the following recitation (emphasis added):

determining a ratio of first interconnect line length along a first direction to a second interconnect line length along a second direction that is approximately 45

degrees from said first direction to create a simulated interconnect line along said preferred wiring angle

In making the anticipation rejection, the Examiner states that Linsker discloses the element above (Office Action, page 3 referring to Linsker, col. 9, ll. 59-67; col. 10, 1-3).

Linsker, in contrast to the Examiner's finding, explicitly states that his discussed ratios are determined "[i]n order to describe wire length savings." (col. 9, l. 59) Determining a ratio of wire length savings for Manhattan versus Euclidean wiring has nothing to do with determining a ratio to create a simulated interconnect line along a preferred wiring angle. Linsker accordingly does not disclose Applicants' claimed invention.

As Linsker does not disclose the subject invention, Applicants respectfully request that the rejection of claims 59-64 under 35 U.S.C. § 102(b) be withdrawn.

B. Rejection of the Claims Under 35 U.S.C. § 103

Claims 65-71 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Teig in view of Linsker. Applicants respectfully traverse the rejection with arguments presented below.

1. Teig Is Not Available as a Reference

The instant application and Teig were, at the time the invention of the instant application was made, owned by Simplex Solutions, Inc. Given that Teig is only available as a 35 U.S.C. § 102(e) reference, the previous statement is sufficient evidence to disqualify Teig from being used in a rejection under 35 U.S.C. § 103(a) against the claims of the instant application. *See "Guidelines Setting Forth a Modified Policy Concerning the Evidence of Common Ownership, or an Obligation of Assignment to the Same Person, as Required by 35 U.S.C. 103(c)," Official Gazette, 26 December 2000.*

As Teig is unavailable as a reference against the instant application, Applicants respectfully request that the rejection of claims 65-71 under 35 U.S.C. § 103(a) be withdrawn.

CONCLUSION

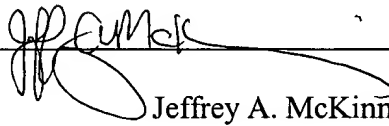
In view of the foregoing, it is submitted that the claims are in condition for allowance.

Reconsideration of the rejections and objections is requested. Allowance is earnestly solicited at the earliest possible date.

Respectfully submitted,

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